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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

JINJU ZHANG, an individual,

Plaintiff,

v.

BENLIN YUAN, an individual; HONG
LIN, an individual; CAMIWELL, INC., a
California corporation; CAMIWELL,
INC. (CANADA), a Canadian
corporation; BEIJING ASIACOM
INFORMATION TECHNOLOGY CO.,
LTD., a Chinese corporation; ASIACOM
AMERICAS, INC., a Virginia
corporation; BANK OF AMERICA
CORPORATION, a National Association;
and DOES 1-20, inclusive

Defendants.

Case No.: 5:23-cv-5818-VC

**DECLARATION OF JINJU ZHANG IN
SUPPORT OF OPPOSITION TO MOTION
OF BEIJING ASIACOM TO DISMISS
FIRST AMENDED COMPLAINT**

Date: August 15, 2024
Time: 10:00 a.m.
Judge: Hon. Vince Chhabria
Courtroom: 4 – 17th Floor

I, Jinju Zhang, declare:

1. I am the plaintiff in the above-captioned litigation.

2. I have personal knowledge of the matters contained in this declaration and, if called upon, could and would competently testify thereto.

3. I make this declaration in support of my Opposition to Beijing Asiacom's Motion to Dismiss.

4. In or about October 2021, from discovery responses produced by Yuan in my previous lawsuit, I learned for the first time that Yuan, purporting to act on behalf of Camiwell U.S., had entered into an agreement (the "Asset Transfer Agreement") with his brother, Ben Tao Yuan, on behalf of Asiacom Americas, by the terms of which Asiacom Americas acquired all of the assets of Camiwell U.S.—including almost all of the employment contracts of our 50 engineers—for \$37,281.29.

5. This price was apparently based on the fully depreciated "book value" of the assets; their actual value was close to \$2,000,000.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that this declaration was executed on June 26, 2024, in Conroe, Texas.



Jinju Zhang